

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP
JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

18-cv-15286-MAS-LHG (Northwestern
Mutual Life Insurance Co.)

STIPULATION AND ~~PROPOSED~~ ORDER

WHEREAS, on October 24, 2018, Plaintiffs in the above-captioned action (the "Action") filed a Complaint (the "Complaint") against Valeant Pharmaceuticals International, Inc., n/k/a Bausch Health Companies Inc. ("Valeant"), J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, and Tanya Carro (collectively, "Defendants," and together with Plaintiffs, the "Parties");

WHEREAS, counsel for Defendants have agreed to accept service of the Complaint;

WHEREAS, counsel for Plaintiffs and Defendants have conferred and agreed to a briefing schedule for Defendants to move to dismiss the Complaint;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that:

(a) All Defendants will have until February 8, 2019, to move to dismiss the Complaint; and

(b) In the event any of the Defendants move to dismiss the Complaint, Plaintiffs will then have until March 8, 2019, to oppose Defendants' motions to dismiss, and

Defendants will then have until March 29, 2019, to file any replies in support of their motions to dismiss.

DATED: January 18, 2019

Stipulated and agreed to by:

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SO ORDERED, on this 24th day of January, 2019.

Michael A. Shipp
THE HONORABLE MICHAEL A. SHIPP
UNITED STATES DISTRICT JUDGE